

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

CHASE WILLIAMS and WILLIAMS
ZHANG, Individually and on Behalf of All
Others Similarly Situated,

Plaintiffs,

v.

BLOCK.ONE, BRENDAN BLUMER, and
DANIEL LARIMER,

Defendants.

Civ. No.: 1:20-cv-2809-LAK

CLASS ACTION

CRYPTO ASSETS OPPORTUNITY FUND
LLC and JOHNNY HONG, Individually and
on Behalf of All Others Similarly Situated,

Plaintiffs,

v.

BLOCK.ONE, BRENDAN BLUMER,
DANIEL LARIMER, IAN GRIGG, and
BROCK PIERCE,

Defendants.

Civ. No.: 1:20-cv-3829-LAK

CLASS ACTION

JOINT STIPULATION

Lead Plaintiff Crypto Assets Opportunity Fund (“CAOF”) and Defendants Block.one, Brendan Blumer, Daniel Larimer, and Brock Pierce (the “Defendants”) (together, the “Stipulating Parties”), by and through their undersigned counsel, hereby stipulate and agree as follows:

WHEREAS, on September 18, 2020, CAOF filed the First Amended Class Action Complaint (the “Complaint”) in this case (ECF No. 66);

WHEREAS, on November 2, 2020, Defendants who had been served or waived service filed a motion to dismiss the Complaint (the “Motion to Dismiss”) (ECF No. 85);

WHEREAS, CAOF filed its opposition to the Motion to Dismiss on December 2, 2020 (ECF No. 92);

WHEREAS, the moving Defendants filed their reply in further support of the Motion to Dismiss on January 11, 2021 (ECF No. 97);

WHEREAS, on May 9, 2021, Lead Counsel of CAOF and Counsel for Defendants informed the Court that a settlement had been reached;

WHEREAS, on June 23, 2021, the Court denied the Motion to Dismiss without prejudice in light of the proposed settlement (ECF No. 114);

WHEREAS, on August 15, 2022, the Court issued a Memorandum Opinion denying approval of the proposed settlement (the “Settlement Opinion”) (ECF No. 146);

WHEREAS, on August 22, 2022, Jeffrey Derrick Anderson filed a Motion to Substitute Lead Plaintiff and to Approve Lead Counsel (the “Substitution Motion”) (ECF No. 148);

WHEREAS, on August 25, 2022, CAOF and Defendants notified the Court that they were engaged in discussions regarding the Settlement Opinion and next steps in litigation and jointly requested that the Court allow Defendants to file either a renewed motion to dismiss or a joint

proposed scheduling order that addresses the timing for renewing their motion to dismiss within 21 days of the Court's ruling on the Substitution Motion (the "Joint Stipulation") (ECF No. 152);

WHEREAS, on August 26, 2022, the Court so-ordered CAO's and Defendants' Joint Stipulation (ECF No. 153);

WHEREAS, on September 27, 2022, the Court denied the Substitution Motion (ECF No. 164), and Defendants' renewed motion to dismiss or a joint proposed scheduling order is now due on October 18, 2022;

WHEREAS, CAO and Defendants continue engaging in discussions regarding settlement in light of the Court's Settlement Opinion and would like to request additional time to explore whether a satisfactory settlement may be achieved;

NOW, THEREFORE, IT IS STIPULATED AND AGREED by and between the undersigned counsel for the Stipulating Parties, subject to the Court's approval, as follows:

1. Defendants shall file either a renewed motion to dismiss or a joint proposed scheduling order that addresses the timing for renewing their motion to dismiss on or before December 5, 2022;

2. Nothing in this stipulation shall prejudice the right of any party to seek further extensions on the consent of the other Stipulating Parties or from the Court.

Dated: October 11, 2022

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/s/ Neal A. Potischman

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*Additional Counsel for Crypto Assets
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SO ORDERED:

Dated: _____

Hon. Lewis A. Kaplan
United States District Judge